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ASSOCIATED GENERAL CONTRACTORS OF
AMERICA, SAN DIEGO CHAPTER, INC.
APPRENTICESHIP & TRAINING TRUST FUND

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

SOHIL KARIMY,

Plaintiff,

v.

ASSOCIATED GENERAL CONTRACTORS OF
AMERICA – SAN DIEGO CHAPTER, INC.,
APPRENTICESHIP & TRAINING TRUST FUND,

Defendants.

Case No.: 08 CV 0297 L (CAB)

**JOINT MOTION TO EXTEND THE
TIME TO RESPOND TO THE
COMPLAINT**

Judge M. James Lorenz

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JOINT MOTION TO EXTEND THE TIME TO RESPOND TO THE COMPLAINT

Case No. 08 CV 0297 L (CAB)

1 Defendant ASSOCIATED GENERAL CONTRACTORS OF AMERICA, SAN DIEGO
2 CHAPTER, INC. APPRENTICESHIP & TRAINING TRUST FUND ("Defendant" or "Trust")
3 and Plaintiff SOHIL KARIMY ("Plaintiff") hereby jointly move that the time for Defendant to
4 respond to the Complaint shall be extended from March 17, 2008, to and including March 24,
5 2008.

6 Good cause exists for this extension because no previous requests for an extension of time
7 have been filed, and the granting of this request will not unduly delay the litigation. This motion
8 is brought in good faith and by agreement of the parties, and is not for any improper purpose.

9 DATED: March 17, 2008

REICH, ADELL & CVITAN, APC

11 By: s/ J. David Sackman
12 Alexander B. Cvitan
13 J. David Sackman
14 Steven T. Nutter
Attorneys for Plaintiff,
SOHIL KARIMY
E-Mail: jds@rac-law.com

15 DATED: March 17, 2008

PROCOPIO, CORY, HARGREAVES &
SAVITCH LLP

17 By: s/ Laura B. Riesenberg
18 David P. Wolds
19 Laura B. Riesenberg
20 Farzeen Essa
21 Attorneys for Defendants, ASSOCIATED
22 GENERAL CONTRACTORS OF
23 AMERICA – SAN DIEGO CHAPTER,
24 INC.; and APPRENTICESHIP &
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CERTIFICATE OF SERVICE BY ELECTRONIC FILING

I am familiar with the United States District Court, Southern District of California's practice for collecting and processing electronic filings. Under that practice, documents are electronically filed with the court. The court's CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document. Registration as a CM/ECF user constitutes consent to electronic service through the court's transmission facilities. Under said practice, the following CM/ECF users were served:

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DATED: March 17, 2008

s/ Alice L. Ross